Before the FE 5 10 59 AM 'SI FEDERAL COMMUNICATIONS COMMI Washington, DC 20554

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In the Matter of

Amendment of Part 74) of the Commission's ) Rules and Regulations with Regard to) the Low Power Tele- ) vision Service

RM-7772

RECEIVED

SEP - 5 1991

Federal Communications Commission Office of the Secretary

To: The Commission

COMMENTS OF THE STAFF OF TV50, INC., CORPUS CHRISTI, TX

TV50, Inc. hereby submits these comments on the Petition for Rule Making (RM-7772) filed by the Community Broadcasters Association ("CBA") on June 10, 1991.

TV50, Inc. is the licensee of Low Power Television stations K50AO, Violet, Texas and K07UD, Corpus Christi, Texas; a simulcast operation with complete studios located at 5215 Embassy Drive in Corpus Christi, Texas. Additionally, TV50, Inc. owns and operates KO7TX, Oklahoma City, Oklahoma. These are all commercial broadcast stations striving to bring to our viewers high quality syndicated and local programming geared to a family-oriented audience. TV50, Inc. is a broadcaster who operates on the philosophy that "to the small market segment we reach, we will be percieved as locally involved, credible, professional and entertaining as any received full-power station". believe that we fill the same amount of space on the screen as a full-power station and we program our operations accordingly.

Our objective concerning this correspondence is to ensure that it be known that TV50, Inc. fully supports the Petition for Rule Making (RM-7772) filed on June 10, 1991 by the Community Broadcasters Association. As it is our commitment to serve our local communities with superior programming and information pertaining to our audience exclusively, we feel it imperative to proceed with steps that will compliment our service to it's fullest degree. We feel strongly that the mentioned items within the petition filed by the CBA (RM-7772) on June 10, 1991 not only will benefit the LPTV service as a whole, but will also benefit the economy of the United States by allowing a huge array of small business owners opportunities to purchase airtime

in a more competitive marketplace at reasonable rates, thus breaking up many local monopolies all over the country. We feel certain that local communities would benefit greatly with creative and innovative television products providing services that operate exclusively within the interests of local communities upon the implementation of the proposed items within RM-7772.

Copies of this filing have been sent today by first class United States mail, postage prepaid, to Peter Tannenwald, Esq., Arent, Fox, Kintner, Plotkin & Kahn, 1050 Connecticut Avenue, N.W., Washington, DC 20036-5339, and the Community Broadcasters Association, P.O. Box 26736, Milwaukee, WI 53226.

Respectfully submitted,

The Staff of TV50 N Inc.

B/D/A

Christopher T. York, Station Manager, K50AO/K07UD David Charles Solomon, General Sales Manager, K50AO/K07UD C. Joyce Fenstermacher, Program Director, K50AO/K07UD

Correspondence:

TV50, Inc. 5215 Embassy Drive Corpus Christi, Texas 78411 (512) 852-8850

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